

FEB 12 2014

2014
Clerk, U.S. District Court
District Of Montana
Billings

Attorneys for Natalia Potanina

In Re the Application of NATALIA
POTANINA

For an Order to Take Discovery

Pursuant to 28 U.S.C. § 1782(a)

Cause N

**APPLICATION FOR
DISCOVERY UNDER
28 U.S.C. § 1782**

Applicant Natalia Potanina has been sued for divorce in the Presnensky District Magistrate Court of Moscow, Russia (the “Moscow Court”). Mrs. Potanina has initiated this Miscellaneous Proceeding in the United States District Court for the District of Montana for purposes of filing this Application, which seeks an *ex parte* Order pursuant to 28 U.S.C. § 1782, authorizing the issuance and service of a subpoena *ad testificandum* and *duces tecum*. Mrs. Potanina seeks this

Application so that Mrs. Potanina may depose and serve document requests upon a company with its principal place of business in the District of Montana to obtain discovery regarding marital assets for potential use in the aforementioned divorce action.

In support of her Application, Mrs. Potanina relies on: (i) the Memorandum of Law filed concurrently herewith; (ii) the Declaration of Natalia Potanina in Support of Application under 28 U.S.C. § 1782(a); (iii) the Declaration of Larisa Ryabchenko of the Bar of Russia in support of such application; and (iv) the Declaration of Katherine S. Huso, attached hereto as Exhibit A.

For the reasons set forth more fully therein, Mrs. Potanina respectfully requests that this Court enter the Proposed Order attached hereto as Exhibit B, authorizing the undersigned attorneys to issue the proposed subpoena attached hereto as Exhibit C.

DATED this 12th day of February, 2014.

MATOVICH, KELLER & MURPHY, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of February, 2014, a copy of the foregoing was served on the following persons by the following means:

<u> </u> CM/ECF	<u> </u> Fax
<u>1, 2</u> Hand Deliver	<u> </u> E-Mail
<u> </u> Mail	<u> </u> Overnight Delivery services

- 1. Clerk, U.S. District Court**
- 2. U.S. District Court Judge**

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